

UNITED STATES DISTRICT COURT )  
 ) ss  
COUNTY OF RAMSEY )

AFFIDAVIT OF  
JOHN T. MILLER

**AFFIDAVIT**

I, John Miller, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a “federal law enforcement officer” within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to request a search warrant. I have been a special agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) since August 2022. As an ATF special agent, I attended and successfully completed the Criminal Investigator Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia. I completed the ATF Special Agent Basic Training Program. I have been trained to conduct state and federal criminal investigations. I work as an ATF special agent in the Saint Paul Field Division, Group IV. I am currently assigned to the Hennepin County Violent Offender Task Force (VOTF). My duties include, but are not limited to, the investigation of violations of the federal firearms, arson, explosives laws, and other federal

laws and regulations of the United States of America. In connection with his official ATF duties, I investigate criminal violations of federal firearms and narcotics laws. Prior to working with the ATF, I was a Steamboat Springs, Colorado Patrol Officer for over five years, as well as a Bayport, Minnesota Patrol Officer for over six years (2011–2017). During those years I worked as a patrol officer, school resource officer, enforcing state laws, and investigating criminal activity.

2. This affidavit is submitted for the limited purpose of establishing probable cause in support of issuing a complaint and arrest warrant for Abdirahman Abdi ABDULLAHI (DOB: XX-XX-01) <sup>1</sup> for arson on property used in interstate commerce, in violation of Title 18, United States Code, Section 844(i).

3. This affidavit is based on my personal knowledge, as well as information I have learned from other law enforcement officers and the review of reports, written materials, and recordings. This affidavit does not include all of the details I have learned regarding this investigation. Rather, it only includes information believed to be sufficient to establish probable cause.

#### **PROBABLE CAUSE**

4. The facts in this affidavit come from my personal observations, my

---

<sup>1</sup> Personal identifying information has been anonymized. Full dates of birth and phone numbers are available upon request.



training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show that there is probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

*The Fire at 8511 Cardiff Lane*

5. On May 31, 2024, at 11:27 a.m., the Eden Prairie Fire Department responded to a fire in a townhome at 8511 Cardiff Lane, Eden Prairie, Minnesota. When the fire started, there were five people in the house: one adult man and four children. One of the children, Minor A, was nine months old.



4. When emergency responders arrived, they met the adult male occupant and three children outside the house, but Minor A was not present. Noticing this, the adult male occupant tried to run back into the burning house before being restrained. Another bystander told police that the baby was still inside.

5. Eden Prairie firefighters entered the residence to rescue Minor A. While searching a smoky second-floor bedroom, Firefighter Joshua Privette's boot collided with an object wrapped in blankets. Looking down, he discovered an infant who was not breathing. Firefighter Privette and other Eden Prairie firefighters carried Minor A out of the house and brought Minor A to Childrens Hospital in Minneapolis. Minor A began coughing and breathing in the ambulance on the way to the hospital, and survived the fire.

6. The house at 8511 Cardiff Lane suffered significant damage, which will require it to be fully demolished.

***Before the Fire, ABDULLAHI Threatened the Occupants***

7. After the fire, ATF Fire Investigator Nichole Hajny and officers of the Eden Prairie Police Department questioned the occupants of 8511 Cardiff Lane. Officers learned that Minor A's mother had lived at the burned home. They further learned that Minor A's biological father was ABDULLAHI. Court records for Hennepin County Case No. 27-CR-22-19335 show that at the time



of the fire, ABDULLAHI was on probation for violating a restraining order that prohibited him from contacting Minor A's mother.

8. Investigators also learned that before the fire, ABDULLAHI sent a threatening message to Minor A's mother. Records from the payment service CashApp, obtained through a state search warrant, show that on May 28, 2024, ABDULLAHI sent a payment to Minor A's mother that contained the message "when I see u I'm smoke u."

***ABDULLAHI Seen in the Area with a Gas Can Before the Fire***

9. After the fire, Eden Prairie police officers canvassed local houses and businesses looking for surveillance footage. Footage from one nearby business, Pizza Karma, showed a man carrying an object that looks to be a gas can shortly before the fire. Based on my discussions with the Eden Prairie Police Department and my review of this footage, I later determined this man to be ABDULLAHI.

10. The footage shows ABDULLAHI park a red Jeep Cherokee outside Pizza Karma at 11:17 a.m. ABDULLAHI opens the rear liftgate and removes a red, square object. Based on my training and experience, this looked to be a gas can.





11. The footage then shows ABDULLAHI carry the gas can to a line of bushes in the direction of 8511 Cardiff Lane.

12. At 11:23am, the footage shows ABDULLAHI emerge from the bushes and return with the gas can to the Jeep Cherokee.





*Investigators Identified ABDULLAHI*

13. Officers traced the red Jeep Cherokee to an Enterprise Rent-A-Car location, where it was rented to a man identified herein as INDIVIDUAL-1 on May 28, 2024. From the Pizza Karma and other camera footage, the Eden Prairie Police Department was able to identify the license plate number of the Jeep Cherokee. The license plate number on the rental agreement matches the license plate from surveillance footage.

14. INDIVIDUAL-1 was later arrested. He told investigators that he rented the Jeep Cherokee on behalf of a man known as “Hallow.”

15. Records from CashApp showed that a user with username “4Hallow” sent INDIVIDUAL-1 three payments on May 28, 2024. One of the payments contained the subject “\$1450 for da kar thank you.”

16. A later search of ABDULLAHI’s phone (discussed below) revealed a text sent on May 28 to INDIVIDUAL-1 about renting the Jeep. At 2:39 p.m., INDIVIDUAL-1 messaged ABDULLAHI “We still getting da V?” INDIVIDUAL-1 followed this question with a picture of a Jeep Cherokee. At 10:07 p.m., ABDULLAHI responded “Ye.” At 10:08 p.m., ABDULLAHI told INDIVIDUAL-1 “Bring all the paperwork and receipts.”

17. As part of the investigation, I examined camera footage from a Speedway store at 6355 Point Chase, Eden Prairie. The footage shows a man arrive in a red Jeep Cherokee and fill a red gas can at 10:51 a.m. on May 31,

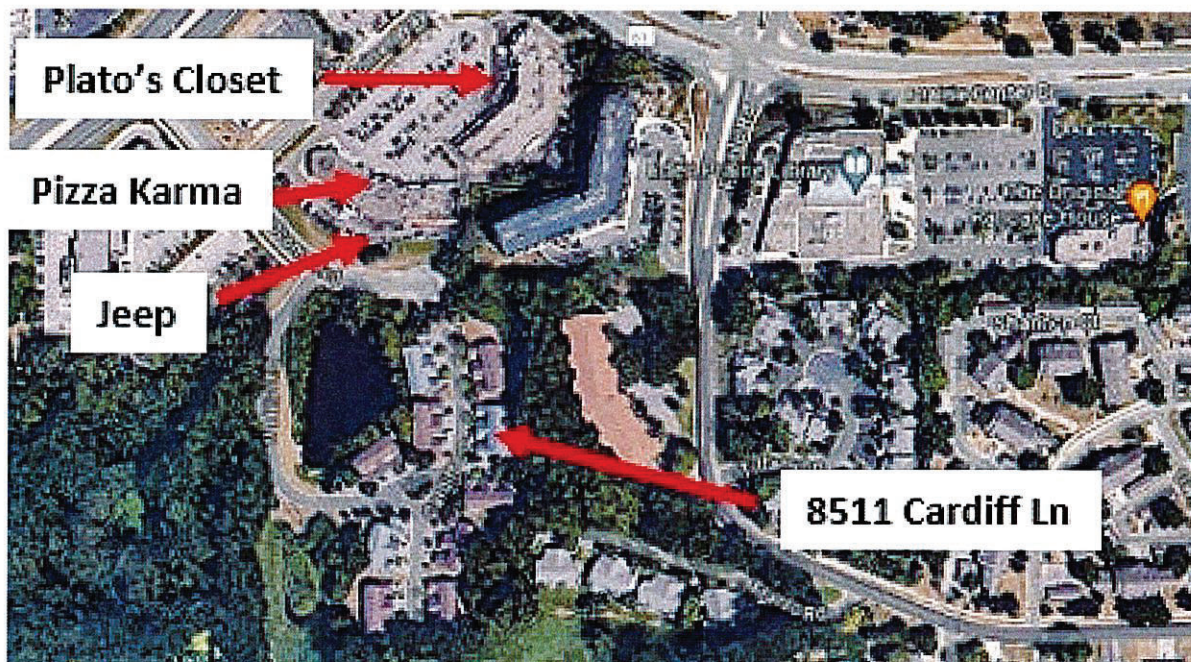


2024. Footage from inside the store shows the man's face at the cash register. Based on my examination of a driver's license photo and my conversations with Eden Prairie Police, I identified this man as ABDULLAHI. The man leaves the Speedway at 10:55 a.m.

18. The Speedway at 6355 Point Chase is approximately an 8-10 minute drive to the Pizza Karma parking lot behind Cardiff Lane.

19. At 11:13 a.m., highway camera footage shows a red Jeep Cherokee driving down I-494 between 6355 Point Chase and Cardiff Lane.

20. Further examination of surveillance footage showed me that the Jeep Cherokee driving down I-494 was the same car seen on later footage in the parking lot behind Cardiff Lane. At 11:16 a.m., footage from a security camera outside the store Plato's Closet, across the parking lot from Pizza Karma, shows a red Jeep Cherokee with a license plate matching INDIVIDUAL-1's rental agreement.



21. I reviewed cell tower records obtained from AT&T through a state search warrant. The records show a phone with the number 612-999-XXXX in the area of 8511 Cardiff Lane between 11:15 a.m. and 11:25 a.m. on the morning of the fire. That phone number is registered to ABDULLAHI.

22. Eden Prairie Police arrested ABDULLAHI and INDIVIDUAL-1 in the evening of May 31. Officers confiscated ABDULLAHI's phone and searched it pursuant to a warrant.<sup>2</sup>

23. When he was arrested, ABDULLAHI was a passenger in a gray Toyota Camry. Officers searched the Camry pursuant to a warrant. Inside, they found white slide slippers, purple latex gloves, a black t-shirt, and a floor mat that smelled like gasoline.

24. The clothes and slippers matched those worn by ABDULLAHI at the Speedway, as well as those worn by the man carrying a gas can across the parking lot towards 8511 Cardiff Lane on May 31, 2024, within five minutes before firefighters responded to the burning house.

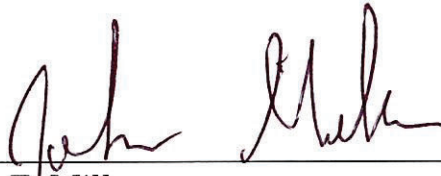




**CONCLUSION**

25. Based on the information set forth above, there is probable cause to believe that the Defendant, Abdirahman Abdi ABDULLAHI, violated Title 18, United States Code, Section 844(i), by committing arson on property used in interstate commerce and causing injury to a person.

Further your Affiant sayeth not.

  
\_\_\_\_\_  
John T. Miller  
Special Agent, ATF

SUBSCRIBED and SWORN to me  
by reliable electronic means via FaceTime  
and email pursuant to Fed. R. Crim. P. 41(d)(3) on  
June 21, 2024:

  
\_\_\_\_\_  
DOUGLAS L. MICKO  
UNITED STATES MAGISTRATE JUDGE  
DISTRICT OF MINNESOTA